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P.O. Box 939
Yosemite, CA 95389
March 12, 2005

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MAR 16 2005

YOSEMITE NATIONAL PARK
RMR-D-58

Dear Superintendent Tollefson,

I respectfully request that the Merced River Plan comment period be extended. With more time to study and continue conversation we will be able to submit more thoughtful and informed comments on this important and complex document.

Thank you for considering this.

Sincerely,  A

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MAR 16 2005

YOSEMITE NATIONAL PARK

RMR-D-59

9 March 05

Dear Superintendent Tallefson,

Since the Merced River corridor is open for comment I want to request that the topic of restoring the natural dam at El Capitan Meadow be kept alive and not forgotten. The combination of River, Meadow and El Cap may be our finest and surely well used resource. I believe the best cluck for our buck in restoring and strengthening both river and meadow is to raise the water table to original or near original levels and allow natural processes to prevail.

Also, when road changes come up please include the removal of Northside Drive from El Capitan Meadow and turning this area also into a bike and pedestrian zone. Fix the road-now-turned-bikepath to allow drainage from the black oak woodland to the meadow, strengthening both.

That's it. You folks are beautiful!

Cheers,

Tom
(OO)



"I Love NPS"

<Yose_Planning@nps.gov>

ORG>

cc:
Subject: Draft Revised Merced River Plan/SEIS

03/21/2005 06:13 PM
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pg 1 of 3

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MAR 21 2005

YOSEMITE NATIONAL PA

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March 21, 2005

Michael Tollefson
Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

Attn: Draft Revised Merced River Plan/SEIS

Dear Mr. Tollefson:

This letter is in response to your public hearings on the Draft Revised Merced River Plan.

The National Parks Conservation Association is America's only private, non-profit advocacy organization dedicated solely to protecting, preserving and enhancing the National Park System. NPCA was founded in 1919 and has more than 300,000 members and supporters.

For the past thirty years NPCA has been advocating for the restoration of Yosemite Valley to a much more natural and beautiful place by phasing out facilities and services that don't belong in a national park. We appreciate all of the work the National Park Service has put into working to identify ways to measure and act on carrying capacity concerns. To our knowledge this is the first time a federal agency has really tried to identify ways to measure and act on these concerns. This is an important and delicate undertaking which requires the NPS to use science and monitoring to manage the park in a way that will protect the remarkable natural and cultural resources while facilitating, to the extent sustainable, a great visitor experience. After all, visitors travel to Yosemite to enjoy nature's beauty unimpaired for generations to come - not stifling crowds and degraded riverbanks.

After careful review of the alternatives in the Draft Merced Wild & Scenic River Revised Comprehensive Management Plan/SEIS we find Alternative 2 as the most desirable. This alternative presents the least restrictive method of providing a positive visitor experience while working to protect the remarkable natural and cultural resources of the area. That said, we have serious concerns with Alternative 2 and the entire draft plan that we elaborate on below:

1. Comprehending the Draft Plan

This document is very difficult to understand.

For example:

Each alternative is presented as a separate process. What is the difference between Interim Limits and Segments Quotas? Try to compare Table II-6 (page II-33) and Table II-11 (page II-59). They are not using the same forms of measurement to make them comparable.

We could only find the Management Action Toolbox for the preferred Alternative 2. In order to make this understandable it needs numbers for measurement and

visible placement for comparison with the other alternatives.

Suggestion:

A guide on "how to" read the document would be very useful. In addition, a short class offered by the planners/consultants who put the document together would be invaluable. During the open houses this dialogue did take place when the correct questions were asked. But if there were a class offered specifically regarding how the draft plan was laid out and how to compare the measurements in the different charts/toolboxes it would make the process a great deal easier.

2. Fact Sheets

The fact sheets are of concern. They were released after the draft plan. There have been a number of new ones added since this process began.

In some cases there are contradictions between the fact sheets and the draft plan. There is concern about the legality of these fact sheets. For example, according to the Overview Fact Sheet there will be redirection to other locations in the park without further review once capacity is reached. We could not find this in the draft plan. It was only after it was brought up during an open house were we informed that this falls under the Superintendent's Compendium.

Are the fact sheets official information statements? There are several instances when it is very difficult to cross-reference the fact sheets to the draft plan. When there are discrepancies, should people be commenting on the fact sheet or the plan? Also these sheets were discovered on a table during the road show. Since they were not mailed out how are we sure that the people who received copies of the draft plan via mail were even aware that these fact sheets exist?

Suggestion:

Explain the purpose of the fact sheets. Are they amendments or clarifications? Do they take the place of sections of the draft plan? Are they official statements of fact? Make sure that they are distributed in the same manner that the draft plan was to ensure equal access to this information.

3. Access and Visitor Experience

There are a number of suggestions in the Management Action Toolbox to deal with park overcrowding including a day use reservation system and redirecting visitors to other areas of the park. The draft plan does not explain how the visitor experience will be maintained through these suggested alternatives. There is also no mention of the strategic public relations plan to ensure that visitors and gateway community leaders will have ample notice.

Here is what the Planning Update (Vol. 27, Feb. 2005) said. "Will visitors be turned away at the gates? Turning people away at entrance gates - or otherwise closing park entrances - is not a proposal under the preferred alternative of the Draft Revised Merced River Plan."

It is unclear if this means that people would be turned away under Alternatives 3 and 4. The reader might miss the significance of 'under the preferred alternative' in the above statement.

Suggestion:

Public Education in which the visitor is "encouraged" to make certain decisions based upon information regarding anticipated experiences (i.e. potential crowds) should be the primary management tool employed before the implementation of specific restrictions and limits. We understand that the NPS are trying to lay out this draft plan so that it can be used for years to come

and that it is important that it does not become too specific. But a comprehensive overview addressing the management actions (such as the example listed above) written in such a way that it is applicable for the future would go a long way in preventing the negative publicity the NPS may attract from the way the draft plan is currently being communicated. A strategic public relations plan might provide for inclusion of the gateway communities as one method to increase positive proactive communications.

4. Resource Protection

The indicators, monitoring protocols, and management actions in this draft plan need to be more illustrative and clear. All of the indicators need to be exhaustive. Suggested management actions must be described through their ultimate effect on resources and visitor activity.

For example:

Redirecting traffic is suggested as a solution to park overcrowding. Where is the traffic going to be sent? What impact will this have on other areas? Where are these people going to park? What impact will that have on the area you are sending them to? How do you plan to repair the damage?

Suggestion:

If you are going to study VERP for the next five years do it right. Be exhaustive and very thorough. Make sure that you over communicate your findings to the public so that they understand why you may have to take management actions. For example, before redirecting traffic as described above, the public would need to be told what the standard was that was being exceeded and how the standard had been determined. It would need to be made clear why the redirection of traffic was in the best interests of both the park and the visitor experience.

5. Funding

There is no mention of the cost of this program. The public needs to understand that YOSE currently does not have the funds to implement this program. What happens if the funds are not there? This plan will almost surely fail without robust funding for monitoring and management.

Suggestion:

Communicate fully the exact situation you are in with regard to funding. Identify the costs of plan implementation. Explain how much implementation of the plan will cost and how the park intends to pay for the robust monitoring and management needs this plan requires for success.

Thank you to the staff and management of the National Park Service for the opportunity to comment on this draft plan. Please contact us with any questions.

Sincerely,

Central Valley Field Representative
National Parks Conservation Association

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MAR 21 2005

YOSEMITE NATIONAL PARK



"Lost World"

To: yose_planning@nps.gov

cc:

ail.com>

Subject: Merced River Plan Input

03/21/2005 10:28 PM

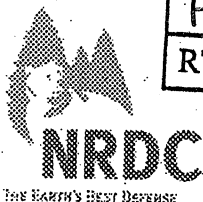
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To NPS,
March 21, 2005

As part of the public comment period for the Merced Wild and Scenic River revised Comprehensive Management Plan, I would like to raise a few items. The entire Yosemite Valley is one big part of the Merced Wild and Scenic River ecosystem. From the steep granite cliffs, to the gentle valley meadows, to the Merced River hiking trails, to the far east end of the valley, all this is the Merced River Ecosystem. Thus, sound ecological upstream resource management practices can ensure a healthy downstream Wild and Scenic Merced River with excellent examples of "outstandingly remarkable values".

Lastly, concerns must be kept in mind when dealing with the construction project, (s), for administrative benefits, within the El Portal Area. It is vital to keep administrative construction projects at El Portal away from the Merced River proper. In the El Portal area of the Merced River, the river offers great biological diversity. Causing any degradation in this diversity is moving in the wrong direction at attempts to maintain a Wild and Scenic River.

Thank You,



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RMR-D-71

NATURAL RESOURCES DEFENSE COUNCIL

March 21, 2005

Superintendent Michael J. Tollefson
Attn: Draft Revised Merced River Plan/SEIS
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

RECEIVED

MAR 21 2005

YOSEMITE NATIONAL PARK

Via email and fax 209.379.1294

Re: Draft Merced Wild and Scenic River Revised
Comprehensive Management Plan

Dear Superintendent Tollefson and Planning Team members:

I am writing on behalf of NRDC -- the Natural Resources Defense Council -- and our more than one million members and supporters, 123,500 of whom live in California, regarding the above-captioned draft plan and the draft Supplemental Environmental Impact Statement that accompanies it. NRDC, its members and supporters have a longstanding love for Yosemite and have worked closely with the National Park Service in its past efforts to plan for and protect the Park's sublime resources, including the Merced River. We appreciate the challenges that face the Park Service now in revising the Merced River Plan and look forward, as you must, to the completion of the final plan and its implementation. As difficult as it may be, however, this planning process provides a needed opportunity to generate and maintain broader public support for your efforts to protect the Merced River and associated resources.

We have reviewed your draft document and wish, by this letter, to endorse the comments on it submitted by the Central Sierra Environmental Resource Center (CSERC) on March 7, 2005. In particular, we too urge that the final plan be more specific and clear about the resources that are most at risk from visitor use and the actions that will be taken to protect those resources. To paraphrase CSERC, the final plan is the means by which the Park Service can guarantee to the public that you will in fact protect the Merced River from harmful human/visitor impacts. We share their concern that proposing -- or even finalizing -- a decision-making *process* will not suffice in these circumstances. The public wants -- and it appears that the law requires -- specific limits on visitor numbers and management actions related to development. Monitoring, accountability and public involvement can and should be part of implementation of the final River Plan, cf. February 2005 Planning Update, p. 5, but are no substitute for specific decisions.

Thank you in advance for the opportunity to participate in planning for Yosemite's future and for your ongoing efforts to protect this park.

Sincerely,

Johanna H. Wald
Director, Land Program

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MAR 21 2005

YOSEMITE NATIONAL PARK



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To: <yose_planning@nps.gov>
cc:
Subject: comments for draft river pan

I am a 31 year resident of Yosemite and this revised and NOT totally comprehensive plan is seems to be written to lawyers and scientists, for the purpose of permitting predetermined projects as the first priority instead of protecting this precious river corridor. If protecting the river corridor is a priority it is not the obvious priority with this plan. Getting the input from America about this with only 2-3 months notice does not seem like the NPS want or need any comments. If you want comments why not solicit the millions of visitors that are here in the summer season?

The River

Everything is so intertwined. The amount of people using the river corridor seems to be the center issue. The easiest example of how the river is NOT protected is the rafting that is a major abuse of this fragile stretch of the Merced River (ORV) with actual impact to the river banks, the river bottom (walking rafts thru shallow areas stirring up natural sediments) as hundreds of colorful rafts and people parading by create an absence of the natural beauty and peace that I expect to find at a river in a National Park.

(So if you take away this entertainment factor in the river corridor it would help with the housing shortage, possibly visitors might have shorter stays resulting in more visitor turnover resulting in more actual visitor numbers, something that seems to be important to NPS but not to the physical park itself. Also included in this entertainment factor is the souvenir shop syndrome resulting in more truckloads of merchandise on the roads. This could be benefit for outlying communities who would open new shops outside the park.)

EI Portal

It is a long process to perfect the idea of protecting the Yosemite Valley and surrounding park. In the early 60's (I think) EI Portal earmarked as a zone to move many buildings and operations in order to better protect the parks natural qualities and remove as many of the buildings out of the park as possible. A great intention, but... the Wild and Scenic Rivers Act included the Merced River to its protection creating a lot more to be considered by the planners. This plan seems outdated as some of the different zonings do not seem to be in compliance with this Federal act. I think it should be realized that the EI Portal area is ORV material and probably should be protected with National Park status (annexed into YNP) and more thought put into what we really need to have a visitor friendly Yosemite National Park.

I would like better alternatives that will address the need to preserve and protect the park without the enhanced commercial aspects. I live here and know that big projects are currently being accelerated that I am sure are to establish the ground work for the not yet established plan. My beautiful Yosemite Valley is being trenched and paved, strewn with orange fencing, signs, detours, areas that say NO TRESPASSING with security guards posted to keep you out, digging machines that are so large it takes a full size truck with crews to transport them. A clear cut logged swath 70yds wide (Cooks Meadow East), How on earth are you going get this new utility system across a federally protected wild and scenic river? Please stop until you have permission.

Please re-do this plan...please don't sell us out THANK YOU FOR READING MY COMMENTS ...

EI Portal

March 18, 2005

Rmr-D-73
pg 1 of 8

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MAR 22 2005

YOSEMITE NATIONAL PARK

Mr. Michael J. Tollefson, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, California 95389

Dear Mr. Tollefson:

I appreciate that opportunity to provide input on the January 2005 draft Merced WSR SEIS. I hope my comments are helpful.

1. The alternatives are not valid.

A. The basis for the user capacities specified in the four management alternatives in the SEIS are inconsistent and contradict the (a) NPS definition of user capacity in the SEIS Glossary, (b) the national NPS Management Guidelines also in the Appendix, (c) the 1982 Federal Interagency Guidelines for WSRs, and (d) 2002 Federal Interagency Task Force Report on Visitor Capacity. More specifically, basing a user capacity on average existing visitor use (alt. 1), existing facility limits (alt. 2 and 4), or zone or segment quotas "regardless of resource and visitor experience conditions" (alt. 3 and 4) is not conceptually sufficient and is contradictory to the Wild and Scenic Rivers Act, prevailing NPS policy, and professional thought.

In the SEIS Glossary, "user capacity" is defined as the "type and level of use that can be accommodated while sustaining the desired resource and social conditions based on the purpose and objectives of a park." NPS Management Policies (C-4) state that when making decisions about capacities, they should be based "on desired resource conditions and visitor experiences for the area; quality indicators and standards that define the desired resource conditions and visitor experiences; and other factors that will lead to logical conclusions and the protection of the park resources and values." The 1982 Federal Guidelines state that carrying capacity is "The quantity of recreation use which an area can sustain without adverse impact on the outstanding remarkable values and free-flowing character of the river area, the quality of recreation experience, and public health and safety." Thus, the alternatives in the SEIS were based on partial and incomplete information.

The 2002 Federal Interagency Task Force Report on Visitor Capacity, co-sponsored by the NPS, provides a fuller list of considerations towards making a reasonable visitor capacity decision (pg. 16):

Inputs to a Capacity Decision. Sound professional judgment relies on many informational inputs. Those particularly relevant to a visitor capacity decision might include:

- *management objectives (including all legislative and policy guidance);*
- *desired future conditions and quality standards (resource, social, management);*
- *current and future recreation demand (who, where, what, when, how, why);*
- *current resources, conditions, uniqueness, capability, and trends;*
- *current management capability and suitability;*
- *current type, amount, and design of facilities and infrastructure;*
- *appropriateness (compatibility) of current or proposed recreation opportunities;*
- *regional supply of the same and similar recreational opportunities;*
- *foreseeable changes in recreation and nonrecreational uses;*
- *existing allocations to permittees and other land uses/users;*
- *significance of the visitation issues and concerns;*
- *potential for natural or cultural resource impairment;*
- *type and amount of best available science and information;*
- *level of uncertainty and risk surrounding consequences of decision; and the*
- *expected quality of the monitoring program.*

B. Alternative 1 is misleading because you equate average existing visitation with the visitor capacity. These terms are not the same. By analogy, the occupancy rate (i.e., visitation) in a hotel, restaurant, train, boat, or airplane is not the same as the visitor capacity in these examples. The occupancy or visitation rate of the Merced WSR is not its user capacity.

In summary, your alternatives are not conceptually valid or legally sufficient in terms of addressing visitor capacity in the Merced WSR area.

2. The alternatives are not sharply comparable, clear, to the point, distinct, nor transparent.

A. The SEIS offers four different programs and processes to address user capacity, rather than four user capacity limits or measurable limits. The public does not care about the program or process or how you package the specific measureable user limits, rather they want to be able to understand and evaluate the alternative numerical limits. The alternatives need significantly more clarity, transparency and comparability.

These four programs and processes are further complicated by a mixture of terms scattered throughout such as quotas, limits, segments, zones, interim, fixed, existing use, maximum capacity, maximum annual, etc. The SEIS is currently too complex and requires an unreasonable amount of tedious study for the decision maker and public to understand.

I recommend you standardize the four alternatives so we can sharply contrast and understand them and their consequences. NPS policy (C-3) states that "For all zones, districts, or other logical management divisions within a park, superintendents will identify visitor carrying capacities for managing public use." In your glossary you state a management zone is a geographical area for which management directions have been developed. Thus, management zones could be a viable unit for presenting your alternatives. I recommend you relocate Appendix A to the introduction part of the alternatives section in the main body and then develop and contrast your alternatives around them. This approach would allow you to adequately and clearly focus on specific areas within the WSR, their special ORVs and different uses and variation across the year, and the broader ecological environment which sustains them.

Most importantly, I recommend you take your Table II-14 Comparison of Alternatives and list the management zones only for the Merced WSR area down the first column, and then display the alternative user capacities for each geographic unit or even subunits within. By displaying the management objectives for each management zone in this table and the significant ORVs, the public could better track the logic and understand the close relationship between management objectives and user capacities.

Another issue is your use of different capacity metrics across the alternatives which make it virtually incomprehensible to understand and to evaluate their comparative merits. You need consistent metrics across all four alternatives rather than mixing apples, and oranges, and prunes as is conveyed in the narrative description of the alternatives and most blatantly on Table II-14.

The most managerially practical and well understood numeric capacity metric is Persons At One Time (PAOT) or Groups At One Time (GAOT). I recommend that each geographic part of the Merced WSR area be subdivided into discrete practical management units with an overall numeric GAOT either as a specific number or numeric range. The numeric capacity decision should duly consider the necessary information that effects a visitor capacity decision (see previous discussion in #1), not simply based on existing use or existing and planned facilities. In addition, each of these units may have other secondary capacity metrics relevant to a specific area or facility such as trailhead quotas, parking spaces, bus capacities, kayaking and commercial rafting capacities, designated campsites, hotel rooms, and employee housing.

B. It is difficult for the reader to keep track of when you are referring to inside the Merced WSR area versus inside the Park in general (e.g., wilderness trailhead quota). Is the river corridor you often refer to always in the WSR? Relatedly, it does not appear that many items in the Superintendent's Compendium, nor many of the trailheads in the quota system, apply to the WSR area. It may be possible to considerably enhance the clarity of the SEIS and its usability by removing the information that is not truly direct and significant to the management of the Merced WSR area.

C. I find your choice of the phrases to define your alternatives to be curious and misleading: alternative 2 offers "interim facility limits", alternative 3 offers a "fixed user limit", and alternative 4 offers a "fixed maximum use level". These terms are not contrasted or defined in your glossary and can influence the public's understanding.

Particularly curious to me is the difference between interim and fixed. In all three alternatives there is discussion that monitoring will be undertaken and mitigating management actions implemented. This is appropriate. With new information or circumstances gained from monitoring, I believe all decisions in this SEIS are interim in a literal sense. Thus, your "fixed" alternatives (3 & 4) are no more fixed than your "interim." I think these terms are confusing, do not add anything of substance, and should be dropped, or at least clarified and contrasted in detail in the main text and glossary. Otherwise, I suspect that the public reviewers will be drawn to the illusion that interim is a softer concept and allows more change than fixed.

3. The SEIS does not provide a reasonable range of alternatives.

My greatest concern with the SEIS is that it does not provide a reasonable range of alternatives. You effectively have two user capacity alternatives: the existing use levels of approximately 3.6 million annual visitors in Alternative 1 and 2, versus a 5.3 million visitors in alternatives 3 and 4.

Furthermore, for 65% of the Merced WSR area, all the alternatives are identical. For all the alternatives, the Superintendent Compendium standards are the same, all the trailhead quotas are the same, and for alternatives 2-4 the VERP standards are the same. Why not consider a range of entrance quotas for the trailheads that feed the WSR? Why not consider a range of standards across the alternatives? For example, why not vary the crowding standards across the alternatives such as 9 encounters versus 6 per day, or 90% of the time versus 60%? Why not consider a range of alternatives for the relevant standards list in the Superintendent's Compendium (e.g., party size)? Why not consider a range in the existing parking capacity that directly feeds into portions of the WSR? Rather than "no net increase" in your standards, why not some variation? I think it would be reasonable, if not mandatory, to consider a reduction in capacity, particularly in areas where ORVs are at-risk or being degraded by visitor use.

Furthermore, given the mix of metrics that you use from one alternative to another, as well as the different ways you package the alternatives (e.g., segments versus zones), you have effectively reduced the range of alternatives by reducing the public's cognitive ability to understand and evaluate their comparative merits.

I don't think you have provided a reasonable range of user capacity alternatives for the decision maker and public to judge, and certainly not alternatives that are clear, distinct, transparent, and sharply comparable.

4. Why discard the interim limits in Alternative 2?

I am confused and frankly dismayed by your supposition that the interim facility limits in alternative 2 will be discarded once VERP is up and running. I don't think the Wild and Scenic Rivers Act had this strategy in mind, nor the National Parks and Recreation Act, nor the NPS national policies, nor the Federal Interagency Task Force on Visitor Capacity. I also think your confidence in VERP, its standards and indicators, the precision and accuracy of any field monitoring activity, or its budgetary requirements (which are not disclosed), is not realistic.

RMR-D-73
pg 588

I don't think the 2004 Court of Appeals ruling had this in mind, and thus it would be fitting to rename this alternative the Interim Judicial Compliance alternative. In my opinion, you are displaying arrogance and stubbornness towards federal public law, our court systems, and a disappointing level of intellect about the value of specifying visitor capacities as a management tool to preserve park resources, quality park experiences, and the WSR ORVs.

5. The regional recreation economic impacts need reexamination.

In the "Regional Economy" discussion of the Environmental Consequences, it is reported that under the current situation the regional economic impact is \$238.8 million dollars given the current 3.6 million annual visitors. Thus, it would appear that the potential economic impact of alternatives 3 and 4 would be substantially larger given a 5.3 million annual user capacity. Yet, in the Environmental Consequences, the SEIS indicates that under Alternative 3 and 4 it is projected that the visitation will decline compared to Alternative 1, and there will be a loss to the regional economy (pages IV-306 and IV-397, respectively).

This is confusing and I suspect not factually accurate. I recommend you reexamine the SEIS on this matter, and considerably expand your regional recreation demand and economic analysis given the considerable amount data that has been provided by your consultants.

I believe your recreation demand analysis is lacking, which of course feeds into your regional economy analysis. I recommend a chart or table that depicts the past 20 years of annual visitation and projected future recreation demand for the next 20 years based upon a reasonable range of a 3%-6% annual increase in visitation. The decision maker and public needs to understand that your annual visitation is likely to pass the 5.3 million mark you use in Alternatives 3 and 4 in a short 10-12 years by my calculations.

I also believe the SEIS needs to clearly compare the projected economic dollars to the region for each alternative. Perhaps a simple matrix displaying the projected expenditures of visitor dollars for each alternative would provide the transparency and clarity needed for due consideration.

6. The cumulative impacts need more rigorous collective analysis.

CEQ regulations define a cumulative impact as the impact on the environment which results from incremental impact of the action when added to (emphasis added) other past, present and reasonably foreseeable futures. CEQ also refers to "collective" analysis. The purpose of this requirement is for the decision maker and public to consider the collective effects of foreseeable multiple events. In the Environmental Consequences and in Appendix F of the SEIS, you list independently each foreseeable project and discuss their impacts.

What I find lacking is twofold. First, there is no presentation and rigorous analyses of the collective effects of the projects you list. You provide individual description but no collective synthesis or analysis. Second, the most significant foreseeable event within the plan's time frame is increasing recreation visitation. Assuming a 4% increase in annual visitation, you will go from 3.6 million visitors in 2003 to 5.5 million visitors in ten years. My point is that

increasing recreation demand is a future action that should be considered in your analysis of cumulative impacts.

7. The decision to only consider VERP-based alternatives needs clarification.

Alternatives 2, 3, and 4 include VERP as the keystone of the user capacity program. The prominence of VERP throughout the document justifies a little more description in order for the decision maker and public to adequately understand. Such a description would also help to justify why no non-VERP alternatives were considered in the SEIS and defend against criticism that you did not provide a range of alternatives that included non-VERP options.

More specifically, I think it would be very useful to the reader if you would provide a description of what would be different if VERP was not used. That is, what does VERP bring to the Merced WSR SEIS that is new, value added, or would not otherwise be done as routine in good professional park planning, management, monitoring and adaptation.

For example, would management zones have been developed without VERP? Would indicators and standards have been established without VERP? Would monitoring take place without VERP? Would adaptive changes in management tools occur without VERP?

In Alternative 1, VERP is not included and was not used in the past to arrive at the current situation. What program or process did you use in the past to derive the management zones and standards set forth in alternative 1, and why can't this process be used in the future? Won't you still use management zones, standards such as Superintendent's Compendium, monitoring, and adaptation as necessary in Alternative 1? My point is that I think the decision maker and public will have a difficult time understanding and evaluating the comparable merits and substantive difference between 1 and the other alternative in terms of not using VERP.

Another confusing aspect is that you have a set of VERP capacity-related standards (Table II-8) and a set of non-VERP capacity-related standards such as the Superintendent's Compendium and wilderness trailhead quotas. What is the relationship between the two? Are the non-VERP standards any less meaningful, precise, or adaptable? How did the development of the standards differ? Will the monitoring/adaptation program for the VERP standards differ from the monitoring/adaptation program for the non-VERP standards?

I am concerned that the decision maker and public may get the impression that VERP brings something substantively and meaningfully different than what has been practiced by the Park in the past, or that would not otherwise be done in the future as a matter of course of good professional park planning, management, monitoring and adaptation.

8. The section on "Addressing User Capacity" has little basis in fact.

Your discussion of user capacity on pages II-16 and 17 is not complete, narrow, and has little basis in fact of the situation on the federal estate.

The reader is left with the impression in reading this section that the question of user capacity is dealt with by a special process or approach such as LAC, VERP, VIM, or ROS. As part of the Task Force effort there was an in-depth survey done of 95 field units from around the United States that had decided upon a numerical user capacity for their managed areas. Participants were asked what decision process or steps were used. Seventeen (17%) percent of the respondents indicated they had used VERP (3%), LAC (11%), or ROS (3%), and no respondent indicated VIM. Most respondents indicated that they were addressing user capacity as one decision among many within a NEPA-compliant planning process, which in my opinion is exactly what is required on you in the Merced WSR SEIS.

Your discussion also gives the sense of agreement and consensus in addressing user capacity. Not true. In the Sept 2004 issue of *Parks and Recreation*, I wrote the following (pg 109):

First, in the early 1980s, the recreation science community rightly disclosed that a numerical visitor capacity was an administrative decision and not a scientific finding. In the absence of a scientifically determined visitor capacity, the recreation science community began to develop alternative monitoring frameworks purporting to address visitor capacity. Some 10 monitoring frameworks have been published (e.g., VERP, LAC, VAMP, VIM, QUALs) that, for all practical purposes, are the same.

Unfortunately, these monitoring frameworks have fostered a number of misunderstandings among managers and researchers. For example, (a) a numeric visitor capacity is no longer an important and fundamental tool for resource planning and management; (b) monitoring enables a manager to circumvent his responsibility of deciding upon a reasonable numeric visitor capacity; (c) monitoring allows us to dispatch a visitor capacity decision to a future time and another person; or (d) a numeric visitor capacity can be determined with enough monitoring and, thus, there is no need for a manager to make a decision now or later.

This titanic myth is at the core of the National Park Service problem in the Merced River case. These monitoring frameworks may be good monitoring frameworks, but they do not replace the need for proactive numeric visitor capacity decisions. Monitoring and visitor capacity are two separate tools and decision points, they are not an either/or option, and both are important to good resource planning and management.

You need a more complete and factual presentation in this Section of how user capacity is being addressed nationally and acknowledge that there continues to be dialogue about how best to proceed.

9. **The inclusion of best available science and information needs expansion.**

Your literature review and the text of the SEIS appears that you have not considered all the best available science and information on visitor capacity. My concern is that institutions often entrap themselves into a phenomenon called "groupthink" and the quality of their decisions are lessened.

For example, the National Park Service commissioned a Social Science Research Review entitled *Visitor Capacity in the National Park System* that was published in Spring 2001 (Volume 2, Number 1). It was a two-year project and the paper was rigorously peer reviewed. There is also the 2002 Federal Interagency Task Force Report on Visitor Capacity sponsored by the NPS and participated in by many NPS professionals. A copy was personally mailed to you over 18 months ago. Based upon a lack of citation and reference, it appears that these recent NPS contributions were not duly considered in the SEIS.

While these and other publications are not hearty endorsements for VERP and may not support your pre-decisional stance, I think these would help to constructively challenge and clarify your thinking about user capacity, all for the purpose of making even better decisions and to fend against elements of groupthink.

This concludes my review comments on the Merced WSR SEIS. Thank you again for the opportunity to review and I hope my comments will be helpful.

Respectfully,

Professor

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03/21/2005 11:10 AM
PST

To: yose_planning@nps.gov
cc:
Subject: Draft Revised Merced River Plan

RMR-D-74 pg 18

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MAR 21 2005

YOSEMITE NATIONAL PARK

March 21, 2005

National Park Service
Yosemite National Park

RE: Draft Revised Merced River Plan

Attn: D. R. MRP

Dear Park Service employee,

Good morning. Regarding the park service's invitation for comments on the proposed plan for the Merced River, here are my quick recommendations. I make these as a frequent visitor to Yosemite National Park and one familiar with the many issues which you face.

The most outstanding and remarkable values (ORVs) of Yosemite and the Merced River Valley are first the peace of the mountains shining into this unique valley. The quiet amidst the mountain majesty removed from commercial development is what most touches people.

Historically people retreated to wilderness to gain special experience of spiritual realities. The Jewish prophets, Jesus and Mohammed all went to wilderness, not the cities or the temples, to encounter deep spiritual experiences. Parks like Yosemite provide this experience, but it is deflected in proportion to the amount of noise, development and traffic that is allowed in the valley. These are qualities which citizens still hunger for and yet with the fast pace of electrified society, the stresses and strains, our cities make these qualities elusive.

Places like Yosemite Valley provide a natural therapy that can not be commercialized without losing the very quality which makes the park so attractive. In proportion to the extent of development, the very qualities of the city -- the tension, the speed, the traffic and the noise -- that cause tension and stress are injected into Yosemite.

My recommendation on the river plan is therefore simple: (1) ensure that every effort is made to maintain its pristine and undeveloped character. Obviously there is a tension between development for commercial purposes and preservation of those qualities which draw tourists and make Yosemite a world class travel destination. In this tension there is a temptation to trade the natural beauty for commercial development because of the lure of greed and money. It should be clear that the more the park succumbs to this temptation, the "money," represented by commercial structures, will mar that beauty and result in the degradation of the park and its decline as an attractive travel destination.

(2) eliminate noise as a major pollutant and disrupter of the ORVs of Yosemite Valley. One small mechanical noise is sufficient to detract from the beauty and spiritual appreciation of this great temple "made without hands."

(3) stop further development of the park. There is already too much infrastructure and this is already decreasing the beauty and aesthetic values of the park.

RMR D-74
pg 2872

The issues which park staff attempts to address are usually caused by failing to discern the differences between the opposing nature of the values associated with wild areas. Essentially these values can be identified as spiritual values, other inherent values and utilitarian values. Because most park staff are trained in biology, science or management, they are not well equipped to discern this taxonomy of values and become confused in the challenges which protection and preservation for the future present.

I would be happy to elaborate on this issue if requested.

Thank you.

Santa Rosa, CA 95407

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RMR-D-15 - RECEIVED

COMMENTS: REVISED COMPREHENSIVE MANAGEMENT PLAN MAR 21 2005
MERCED WILD AND SCENIC RIVER

YOSEMITE NATIONAL PARK

The 2004 Court Order directed the N.P.S. to revise the Merced River Plan. [1] Address the user capacity and [2] Reassess the river corridor in El Portal. For the most part, Alternative 2 seems to be the best of the four alternatives offered. Areas of concern presented in this Alternative are:

Visitor Capacity: Overcrowding is one of the biggest problems facing the visitor to the Valley as well as impacting and degrading of the resource. The 1980 General Management Plan established a day use visitor capacity of 18,241. This Plan was developed and carefully researched but not funded or implemented. That number for day use visitors in the Valley at any one time is still applicable today and should be used as a baseline for day use visitation. This combined with the continued removal of certain facilities out of the Valley would lessen the pressure on the river corridor. To achieve this level of visitation a system of day-use permits may be necessary for day-use visitors. As a start, on high use visitation days such as holidays and weekends, a program could be established for day-use permits. For years now, permits for entrance into the backcountry wilderness have been required to lessen the impact on the resource and seems to be working.

Native Oak Habitat: Care must be taken in the protection of the Merced River not to overlook the impact of infringing on the native oak habitat. Removing certain development and restricting activities in the river corridor and forcing same to other Valley areas at the expense of other remarkable resources could present problems. Those magnificent groves of Black Oak add to the grandeur of Yosemite Valley. The Yosemite Oak historically has played a major role in the lives of the first inhabitants, the Ahwahnechee. At a time when Sudden Oak Death has killed tens of thousands of California native oak trees, all the species of the Yosemite Oak have shown a resistance to this plague. Zoning of the rare Yosemite oak woodlands to allow lodging, campgrounds, or other development should be avoided. Soil compaction and paving around Oak prevent the root breathing, which maintains the health of the tree. Impacted areas that exist now are in the area between the Lodge and Swan Slab and on down to the parking lot at Camp 4. Expansion of Camp 4 should be carefully planned away from Oak habitat. Oaks support more than 300 species of wildlife and for that reason alone should be protected.

Yosemite Meadows: Meadows in Yosemite are another highly valued and shrinking resource. Historically, many tributaries of the Merced River have been altered to accommodate development. A result has been to alter the natural braided flow of

runoff into the meadows thus lowering the life sustaining water level. Any future Yosemite Plan should avoid endangering meadow health and immediate plans should be undertaken to correct current problems. No River Plan should be approved without completely addressing this issue.

The Automobile: Traffic congestion has long been one of the main complaints of Yosemite visitors. Long lines of cars cruising around the borders of the river cannot help but degrade the visitor experience and in turn harm the resource. At times roads even intrude into the scenic river corridor itself. Planners should look at the Zion N.P. Traffic Plan for a model of auto visitation. In Yosemite, those visitors that have reservations for a campsite or lodging could have been issued at the gate a color-coded windshield pass that directs one to a designated parking location. The visitor's car would then stay in that space for the duration of their stay. The free shuttle service would be used for visiting the various Valley locations. This Plan would need to be supported by expanding the shuttle service to include West Valley destinations not presently served. This would greatly reduce the traffic flow that visitors presently have to endure.

Education: The problem of enhancing the visitor experience and protecting the resource is a big one. There are a wide variety of reasons why people visit Yosemite. Some have a very high IQ about resource protection and others have none at all. Any Plan to be effective needs to have an interaction between Park Service interpreters and the public. The public needs to be informed as how best to interact with the wonders of Yosemite and how best to visit this wonderful place. People need to be informed as to why they should not tramp across the meadows, pick the flowers and feed the bear or deer. More funding for interpretation and less for concession enhancement might be one answer. Information centers at the entrance gates would greatly help in informing the visitors about Yosemite.

Respectfully submitted by:

Yosemite Advisor, California Oak Foundation

Director, California Oak Foundation

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MP

03/21/2005 09:55 AM
PST

To: yose_planning@nps.gov
cc:
Subject: Merced River

ZMR-D-76

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MAR 21 2005

YOSEMITE NATIONAL PARK

The NPS appears to have blinders and ear plugs on when it comes to Yosemite, the Merced River and its special values. Yosemite is one of the most visually stunning locations in the world, the Merced River is one of the most treasured Rivers. Yet this plan reflects that the Park Service does not understand the special values and the special experience to be had. Instead, the Park Service continues with treating the River Plan as a bureaucratic annoyance to get out of the way so it can continue on the continuing juggernaut of construction, commercialization, and pavement.

This River Plan serves the dictates of the predetermined Yosemite Valley Plan. The Management Zones continue to justify the build out plans, and more, of the YVP. On top of that, the Park Service continues to show a chart that purports to show the Yosemite Valley Plan is based on the River Plan. A valid finalized River Plan does not yet even exist, so it is obvious to anyone that the Yosemite Valley Plan is predetermining the zoning in the River Plan. Instead protection of the River's special values should be determining the River Plan; then and only then, should a plan, such as the YVP be put together. YVP projects should have been and should be based on whether or not they degrade River values. If they do degrade the River, then they should not take place.

The Yosemite Valley Plan supports a marketing plan to transport hundreds of thousands of additional short term tourists enticed into Yosemite to spend money at concessions by both Park Service and Concessioner marketing campaigns. This would entail more pavement in Yosemite Valley and elsewhere in the Park. Almost all of these plans will degrade the Merced River's values and degrade and interfere with the visitor experience of the River's and Park's natural values. User capacity including the all important types of uses (uses based on the natural and cultural values of Yosemite, versus resort/urban amenities and construction), are integral to a plan that protects the River's values, and cannot merely be slapped onto an already invalid plan -- unfortunately, that is just what NPS did in the D. R. MRP.

Please realize that this plan is a scam, and degrades America's heritage, and endangers our home land.

Thank you,

Seattle, WA 98106

National Park Service
U.S. Department of the Interior



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RMR-D-77

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MAR 21 2005

YOSEMITE NATIONAL PARK

Revised Comprehensive Management Plan/SEIS

Note: Anonymous comments will not be considered. If you do not want your name or/and address to be subject to public disclosure, please state that at the beginning of your comments. Such requests will be honored to the extent allowable by law. Generally, The National Park Service will make available to the public for inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses.

Name: _____

Date of Comment: 18 March 2005

Address:

Cloniz, Ca. 93612

Comments

Having been directly involved in enjoyment of Yosemite National Park for the past twenty plus years, I have become aware of the many issues which face one of Gods truly great treasures. Just the constant use by so many people every year and the continual degradation of the parks many assets has forced to the forefront the measures necessary to ensure generations to come will have the same breath taking experience. You and your staff are to be commended for the foresight, and professional manner in which this plan has addressed the many concerns and areas necessary for continual enjoyment. My hope is that the general public

(continue comments on back of page)

will respect this remarkable resource and keep in mind that it is dedicated professionals such as yourselves that know a little more about true Stewardship than they are given credit for.

I have had the chance to show off some of your work to a few friends and the response was quite positive. we can remember the crowded parking lot and smoke spewing buses at Yosemite Falls as well as the throngs of people stretching the restrooms to the breaking point. The new loop trail and restrooms have blended quite naturally and have all but erased an unpleasant memory.

If this is a sample of your future plans, then you must be as proud of the outcome as you are with your plan. By the way the inset stonework looks fantastic. Ares wishing the N.P.S. @ Yosemite all the greatest success.

Respectfully,

A. P. S. A

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RMR-D-78
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MAR 22 2005

YOSEMITE NATIONAL PARK



To: yose_planning@nps.gov
cc:
Subject: mrp -commercial buses

03/21/2005 10:25 PM
PST

I have not taken the time to investigate the endless varieties of VERP, but I think there should be no bus parking. Buses should drop off there load of visitors and then be sent to Badger or El portal to wait a few hours before returning.

I am also wary of plans that say in x years we will reevaluate based on VERPS. Managers of the future will be endlessly swayed by politicians, the concessionaire, lawsuits, and narrow minded user groups. I think strick user numbers set up to last a decade is a safer route. although Verps may be a valuable tool, I am skeptical of the the individuals who wield it.

Please remember that we have now witnessed 7 years of declining or flat visitation. Perhaps the plans hatched in the late 90s for out of the park parking lots and wide roads to get buses in and out were unnecessary. Even instilling in the public that daily quotas might happen seemed to have cut visitation by 5%. If NPS really enforced quotas say the 8 busiest weekends of the year i bet that would scare off 10% of visitation which would make the quotas almost unnecessary. Solution which involve less construction are better.

Fresno, CA 93720

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